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*Interim Lead and Liaison Counsel for  
Indirect Purchaser Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE STATIC RANDOM ACCESS  
MEMORY (SRAM) ANTITRUST  
LITIGATION

Case No. M:07-CV-01819-CW

MDL No. 1819

This Document Relates to:

ALL INDIRECT PURCHASER ACTIONS

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO EXTEND TIME FOR  
INDIRECT PURCHASER PLAINTIFFS  
TO FILE UNREDACTED DOCUMENTS  
PURSUANT TO THE COURT'S ORDER  
ON INDIRECT PURCHASER  
PLAINTIFFS' MOTION TO SEAL**

WHEREAS, on July 2, 2009, Indirect Purchaser Plaintiffs ("Plaintiffs") filed their Reply Memorandum In Support of Class Certification ("Reply Brief") along with the Declaration of Christopher T. Micheletti in support thereof, and exhibits thereto ("Micheletti Exhibits"), and the Reply Declarations of Mark Dwyer, Ph.D ("Dwyer Reply Declaration") and Michael J. Harris ("Harris Reply Declaration"), and exhibits thereto ("Dwyer Exhibits" and "Harris Exhibits");

WHEREAS, on July 8, 2009, Plaintiffs filed an Errata to the Declaration of Christopher T. Micheletti to correct certain typographical errors and the inadvertent omission of pages from certain Micheletti Exhibits;

WHEREAS, Plaintiffs filed unredacted versions of their Reply Brief, the Dwyer Reply

1 Declaration, the Harris Reply Declaration, and certain Micheletti Exhibits, Dwyer Exhibits, and  
2 Harris Exhibits under seal because these documents contain nonpublic, confidential, proprietary and  
3 competitively sensitive information of the Defendants and third parties;

4 WHEREAS, on July 2, 2009, Plaintiffs filed an Administrative Motion to Seal Documents  
5 Pursuant to Civil Local Rules 7-11 and 79-5 ("Motion to Seal"), and the declaration of Christopher  
6 T. Micheletti in support thereof;

7 WHEREAS, the declaration of Christopher T. Micheletti filed in support of Plaintiffs'  
8 Motion to Seal contained a list of confidential third-party information in the Reply Brief, Micheletti  
9 Exhibits, Dwyer Reply Declaration and Exhibits, and Harris Reply Declaration and Exhibits;

10 WHEREAS, on August 19, 2009, the Court granted in part and denied in part Plaintiffs'  
11 Motion to Seal ("August 19, 2009 Sealing Order") and did not set forth a deadline within which  
12 Plaintiffs shall file the unredacted portions of documents the Court ordered to be filed in the public  
13 record;

14 WHEREAS, on August 21, 2009, third party Kyocera Wireless Corporation ("Kyocera")  
15 advised Plaintiffs that it intends, on or before August 26, 2009, to file a Request to Modify the  
16 Court's August 19, 2009 Sealing Order to request that certain of its confidential information be kept  
17 under seal, and to lodge a proposed order granting its Request to Modify the Court's Sealing Order;

18 WHEREAS, in order to allow the Court time to rule on Kyocera's Request to Modify the  
19 Court's Sealing Order, the parties agree that Plaintiffs may have until three Court days after the  
20 Court rules on Kyocera's Request to Modify the Court's Sealing Order to file in the public record  
21 unredacted versions of portions of the Reply Brief, Dwyer Reply Declaration and Exhibits, Harris  
22 Reply Declaration and Exhibits, and Micheletti Exhibits not sealed by Court Order.

23 NOW THEREFORE, it is hereby stipulated by the undersigned counsel on behalf of the  
24 parties identified below, and subject to the Court's approval, that:

25 Plaintiffs shall file in the public record, no later than three Court days after the Court rules on  
26 Kyocera's Request to Modify the Court's Sealing Order, unredacted versions of all portions of the  
27 Reply Brief, Dwyer Reply Declaration and Exhibits, Harris Reply Declaration and Exhibits, and  
28

Micheletti Exhibits not sealed by Court Order.

Dated: August 21, 2009

By: /s/ Christopher T. Micheletti  
CHRISTOPHER T. MICHELETTI  
ZELLE HOFMANN VOELBEL  
& MASON LLP  
*Interim Lead and Liaison Counsel for  
Indirect-Purchaser Class*

Dated: August 21, 2009

By: /s/ Patrick M. Ryan  
PATRICK M. RYAN  
WINSTON & STRAWN LLP  
*Liaison Counsel for Defendants*

*Additional Defendants and Counsel:*

**LATHAM & WATKINS LLP**

**WHITE & CASE LLP**

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Toshiba Corporation and Toshiba  
America Electronic Components, Inc.

By /s/ Matthew S. Leddicotte  
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**O'MELVENY & MYERS LLP**

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By /s/ Michael F. Tubach  
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Hynix Semiconductor America Inc.

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**SHEPPARD, MULLIN, RICHTER &  
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America, Inc., Mitsubishi Electric  
Corporation, and Mitsubishi Electric &

By /s/ James L. McGinnis  
James L. McGinnis  
Attorneys for Defendants  
Samsung Electronics America, Inc.,  
Samsung Electronics Company, Ltd., and  
Samsung Semiconductor, Inc

1 Electronics USA, Inc.

2 I, Christopher T. Micheletti, hereby attest, pursuant to N.D. Cal. General Order No. 45, that  
3 the concurrence to the filing of this document has been obtained from each signatory hereto.  
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5 /s/ Christopher T. Micheletti

6 Christopher T. Micheletti  
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1           **IT IS SO ORDERED.**

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3                     8/26

4       Dated: \_\_\_\_\_, 2009



5                     \_\_\_\_\_  
6                     THE HONORABLE CLAUDIA WILKEN  
7                     United States District Judge  
8                     Northern District of California  
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